

1 THE HONORABLE JAMES L. ROBART
2
3
4
5
6
7

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA
GARRETT, ROBERT NIXON,
SAMANTHA NIXON, DAVID
BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN,
ROGELIO VARGAS, MARILYN DEWEY,
PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

**STIPULATION BETWEEN PLAINTIFFS
AND DEFENDANTS AND [PROPOSED]
ORDER AMENDING DEADLINES
RELATED BRIEFING SCHEDULES**

Noted: July 11, 2024.

1 Defendants David Ramsey, III and The Lampo Group, LLC have noted a Motion to
2 Compel Arbitration of all Claims and Stay Case pending Arbitration for July 18, 2024. Defendant
3 Happy Hour Media Group has noted a motion joining the foregoing Defendants noted for August
4 2, 2024. The Plaintiff's response to the first motion is due on July 11, 2024 and the second motion
5 is July 26, 2024. The Plaintiffs and Defendants have conferred and agree that it is more efficient
6 and in the best interests of all parties to align the response dates and noting dates.
7

8 THEREFORE, Plaintiffs and the foregoing Defendants have agreed to the following
9 deadlines and ask that the Court enter an Order adopting them:

10 Date by which any opposition will be due to all Defendants' Motions:
11

12 **July 26, 2024**
13

14 Date by which any reply brief to the same will be due:
15

16 **August 9, 2024**
17

18 STIPULATED TO this 11th day of July, 2024.
19

20 **ALBERT LAW PLLC**

21 By: s/ Gregory W. Albert
22 Gregory W Albert, WSBA #42673
Tallman Harlow Trask, IV, WSBA #60280
3131 Western Ave, Suite 410
Seattle, WA 98121
Phone: (206) 576-8044
Fax: 425-659-2678
Email: greg@albertlawpllc.com
tallman@albertlawpllc.com

23 **FRIEDMAN RUBIN PLLC**

24 By: s/ Roger S. Davidheiser
25 Roger S. Davidheiser, WSBA #18638
1109 1st Ave Ste 501
26

27 **MORGAN, LEWIS & BOCKIUS,
28 LLP**

29 By: s/ Damon C. Elder
30 Patricia A. Eakes, WSBA No. 18888
Damon C. Elder, WSBA No. 46754
1301 Second Avenue, Suite 2800
Seattle, WA 98101
Tel: (206) 274-6400
Email: patty.eakes@morganlewis.com
damon.elder@morganlewis.com

31 *Attorneys for Defendants David L.
32 Ramsey, III and The Lampo Group,
33 LLC*

1 Seattle, WA 98101-2988
2 Phone: (206) 501-4446
3 Fax: 206-623-0794
Email: rdavidheiser@friedmanrubin.com

4 *Attorneys for Plaintiffs*

5 **CORR CRONIN LLP**

6
7 By: s/ Jack M. Lovejoy
Jack M. Lovejoy, WSBA No. 36962
8 Maia R. Robbins, WSBA No. 54451
1015 Second Avenue, Floor 10
9 Seattle, Washington 98104
Phone: (206) 625-8600
10 jlovejoy@corrchronin.com
11 mrobbins@corrchronin.com

12 **Attorneys for Defendant Happy Hour Media Group**

1 **[PROPOSED] ORDER**

2 IT IS SO ORDERED. The Clerk is DIRECTED to renote the motions to compel
3 arbitration (Dkt. ## 82, 84) for August 9, 2024.

4 DATED this 12th day of July, 2024.

5 
6 The Honorable James L. Robart
7 United States District Judge